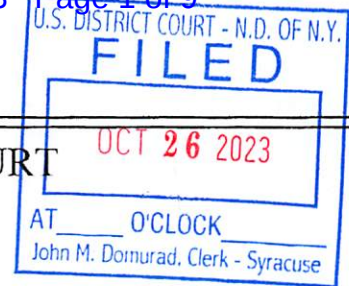


AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the
Northern District of New York

UNITED STATES OF AMERICA

v.

Jobie Patterson

Case No.

5:23-mj-612 (TWA)

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of July 26, 2023 in the county of Onondaga in the Northern District of New York the defendant violated:

Code Section
18 U.S.C. §§ 2252A(a)(5)(B)

Offense Description
Possession of child pornography

This criminal complaint is based on these facts:
See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Heather Weber, FBI Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: Oct 26, 2023

Judge's signature

City and State: Syracuse, NY

Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

United States v. Jobie Patterson

Case No.

Filed Under Seal

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Heather Weber, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging Jobie Patterson with violating Title 18, United States Code 2252A(a)(5)(B), possession of child pornography.

2. I am a Special Agent with the Federal Bureau of Investigation and have been since September 2014. While serving as an FBI Special Agent I have conducted and participated in investigations involving narcotics trafficking, firearms trafficking, robberies, and violent crimes. I have also participated in numerous investigations involving child exploitation.

3. The facts in this affidavit come from my personal observations, my training and experience, conversations with other FBI Special Agents and information obtained from other law enforcement officers. This affidavit is intended to show merely that there is probable cause for the requested complaint and does not set forth all my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Jobie Patterson has violated Title 18, United States Code, Section 2252A(a)(5)(B) by possessing child pornography.

PROBABLE CAUSE

5. On May 22, 2023, a federal search warrant was signed in the Northern District of New York by the Honorable Thérèse Wiley Dancks, United States Magistrate Judge that

authorized the search of the iCloud account registered to dXXXXXpatterson@gmail.com for evidence of violations of 18 U.S.C. § 933 (a) trafficking in firearms, and/or conspiracy to do so, 18 U.S.C. § 922(d)(1), disposing of firearms to a convicted felon, 18 U.S.C. § 922(g)(1), possession of a firearm or ammunition by a convicted felon.

6. The iCloud account registered to dXXXXXpatterson@gmail.com had numerous indications that the account was used by Patterson. For example, the photo library of this extraction included many pictures that depicted Patterson. These images included “selfie” style photographs that depict Patterson and appear to have been taken by Patterson.

7. This extraction also included numerous photos of the premises identified during the course of the investigation as Patterson’s residence.

8. This extraction also contained messages that indicated that Patterson was the owner ad of the account. For example, in March, 2023, Patterson sent a text to a number ending in 1034, “It’s Jobie”. On another date, Patterson sent to a number ending in 5873 the following message, “Allow me to introduce myself my name is!!! Syke, I’m Jobie Patterson & how are you”.

9. Patterson’s iCloud had frequent connections to the IP address¹ 67.249.100.111. On August 14, 2023, the FBI provided Charter Communications with a subpoena for account information associated with this IP address. Charter responded to that subpoena with the following account information.

Phone number: [XXX]-[XXX]-9759 (previously identified as Patterson’s cell phone)

Email: dXXXXXpatterson@gmail.com (Patterson’s legal middle name is DXXXXX)

¹ IP Address: The Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the internet.

Address: [REDACTED], Syracuse, NY 13205 (Patterson's known residence address)

Subscriber: Derrick Jackson

Based on my training and experience, it is common for individuals involved in the illicit activity to provide a fictitious name to their internet provider in order to avoid law enforcement detection.

10. PATTERSON was formerly employed at Hillbrook Juvenile Detention Facility ("Hillbrook") until on or about January, 2023.

11. On May 25, 2023, Apple provided your affiant with information in response to the search warrant. On May 31, 2023, your affiant began to review the information provided by Apple, Inc. pursuant to the search warrant following the processing of the data by the FBI Albany Division Computer Analysis Response Team.

12. On May 31, 2023, while reviewing the data in the iCloud account pursuant to the warrant, your affiant observed text communications and images in plain view that appeared to indicate that the account owner and an unidentified female were engaged in a sexual relationship. These included sexually explicit images of a female (V1) who, based on the content of the communications, was apparently an inmate at Hillbrook Juvenile Detention Facility ("Hillbrook"). Following the discovery of this material, the search for further evidence was paused. FBI agents and Task Force Officers (TFO) in the Albany Division, Syracuse Resident Agency were consulted regarding the possibility that the material and images observed in plain view contained evidence of federal child exploitation offenses.

13. On June 2, 2023, FBI TFO Andy Wilmot brought a photo of V1 to members of the Onondaga County Sheriff's Office ("OCSO") at Hillbrook to attempt to identify if V1 was actually incarcerated at Hillbrook. Members of the OCSO confirmed that V1 was incarcerated at the time the pictures and conversations took place, and that V1 was 16 years old at the time of this activity.

Members of the OCSO stated that PATTERSON, while employed at Hillbrook, was investigated for allegedly providing V1 with a cell phone (with a camera), and he was suspected of having had a sexual relationship with her. As of the writing of this affidavit, V1 is not longer at Hillbrook.

14. PATTERSON was arrested by the Onondaga County Sheriff's Office (OCSO) in January 2023 for providing a cell phone to a female inmate of Hillbrook Juvenile Detention Facility ("Hillbrook"). A review of PATTERSON's criminal history revealed a January 2023 arrest by the OCSO for introducing contraband into prison. The FBI was advised the reports regarding this incident are sealed as the result of the charges being dismissed.

15. On July 26, 2023, an amended federal search warrant was signed in the Northern District of New York by the Honorable Thérèse Wiley Dancks, United States Magistrate Judge that authorized the search of the iCloud account registered to dXXXXXpatterson@gmail.com for evidence of violations of 18 U.S.C. §§ 2252(a)(5)(B) and 2252(b)(2), possession of child pornography, and 18 U.S.C. §§ 2251(a) and 2251(e), sexual exploitation of a child.

16. During the review of the evidence obtained pursuant to the amended search warrant, your affiant observed a text message conversation between dXXXXXpatterson@gmail.com, (Jobie PATTERSON) and a phone number ending in 9467, which there is probable cause to believe is the phone number used by V1 during the relevant period because images sent from that number depict V1. Images and videos that were sent as text messages appeared in the conversation as a

symbol with the text, “OBJ.”² The actual images and videos that were exchanged via text message were included in the “Media” section of this extraction.³

17. In my review of the text messages between PATTERSON and V1 I found that, on November 10, 2022, PATTERSON sent the following message to V1, “Let me see ya pussy”. Later on November 10, 2022, the following conversation occurred between PATTERSON and V1.

PATTERSON: “Let me see ya kitty Kay”

Victim: “Rn?” [Right now?]

PATTERSON: “Yup”

PATTERSON: “The day that I wake up to u will be heaven on earth”

Victim: “Im struggling to take a picture down there”

Victim: [OBJ] (Writer note: this symbol indicates that a picture or video was sent)

Victim: “I promise tonight when I get in the shower ima take it in the bathroom”

PATTERSON: “Are u afraid of a lil hair lol”

Victim: “Lol no”

Victim: “Is not that baby”

Victim: “I don’t want the staff to see me”

² “OBJ” is a symbol used to represent an embedded object in a document when it is converted to plain text.

³ Each file in the media section contained a unique filename. Based on my training and experience, when pictures and videos are captured on a specific device, the filenames attached to these files remain consistent, with slight variations due to naming conventions and the date and time of the file’s creation. When an image is captured on a device and then sent via text message, the original filename that was assigned to a media file upon creation will typically not change when it is received by another device.

Victim: "In here naked and dhit tryna take a picture"

18. The following image and video files were recovered during the search of the iCloud account for evidence of the above-described child pornography offenses, pursuant to the amended search warrant:

19. "Resized_20221110_231447.jpeg." Based on my training and experience, the file name indicates that this photo was taken on November 10, 2022. This image depicts V1's face and shows her wearing a white sports bra style top.

20. "Resized_20221111_010819.jpeg." This file name indicates that this photo was taken on November 11, 2022. This picture depicts a person who appears to be V1 touching her vagina. While V1's face is not visible, the same sports bra depicted in the image described above appears to be worn by the female in this picture. A comparison was performed on "Resized_20221111_010819.jpeg." and "Resized_20221110_231447.jpeg." and it was noted that based on the clothing and the skin tone, the images appear to depict the same individual. This image was found twice in the extracted data, indicating that the photo was copied from PATTERSON's messages to PATTERSON's photo gallery.

21. A short video titled "20221110_223715.mp4" depicts a vagina. The filename indicates that this video was taken on November 10, 2022. It was noted that the skin tone of the individual in the video appears to match that of the victim.

22. A video titled "20221112_213109_1_1_001.mp4" depicts a female touching and digitally penetrating her vagina. The filename indicates that this video was taken on November 12, 2022. It was noted that the skin tone of the individual in the video appears to match that of the victim.

23. A video titled "20221112_212051_1.mp4 depicts the victim with her face clearly shown. The victim's bare breasts are shown in this video. The filename indicates that this video was taken on November 12, 2022.

24. There were numerous other pictures that appear to depict the victim. Two pictures that based on the filenames appeared to have been captured on November 15, 2022, that depict a female touching her vagina. An image likely captured on November 12, 2022, depicts what appears to be the victim without clothing holding her breasts. An image likely captured on November 10, 2022, depicts what appears to be the victim's vagina and anus. An image captured on November 9, 2022, depicts the victim without clothing. It appears that this victim took this photo in a bathroom mirror. There were 11 additional photos that captured the victim in her underwear or exposing her breasts.

25. The images described in this affidavit are available for the Court's review upon request.

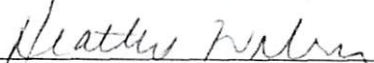
26. I also observed text communications between PATTERSON and V1 consistent with those I initially saw in plain view and which reflected that V1 was an inmate at Hillbrook.

CONCLUSION


27. Based on the aforementioned information, I respectfully submit that there is probable cause to believe that Jobie Patterson has violated Title 18, United States Code 2252A(a)(5)(B), in that he possessed child pornography, in a Cloud account he maintained with Apple, and respectfully request that the Court authorize the filing of the accompanying complaint

so that Patterson may be brought to court for further proceedings in accordance with law.

Attested to by the Affiant,


Heather Weber
Special Agent
Federal Bureau of Investigation

I, the Honorable Thérèse Wiley Dancks, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on the 26th day of October, 2023 in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.


Hon. Thérèse Wiley Dancks
United States Magistrate Judge